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NOV 29 2012 November 29, 2012

Honorable Katherine B. Forrest
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Illinois National Insurance Company v. Tutor Perini Corporation
Index No. 11-cv-00431

Dear Judge Forrest:

We represent Defendant and Third-Party Plaintiff Tutor Perini Corporation ("Tutor Perini") in the above referenced matter. Tutor Perini submits this letter with Plaintiffs Chartis¹ and Third-Party Defendant Certain Underwriters at Lloyd's, London ("Lloyd's") (collectively, the "Parties"). Counsel for both Chartis and Lloyd's have reviewed the contents of this letter and they join in the extension requested herein.

Pursuant to section 1.G. of your Honor's Individual Practices, the Parties respectfully request an extension of Tutor Perini's time under Local Rule 6.3 to file a motion for reconsideration of this Court's Memorandum Decision and Order dated November 15, 2012. Judgment was entered November 19, 2012. Pursuant to Local Rule 6.3, Tutor Perini's last day to file the motion is Monday, December 3, 2012.² The Parties respectfully propose the following briefing schedule:

¹ Illinois National Insurance Company ("Illinois National"), The Insurance Company of the State of Pennsylvania ("ICSOP"), and National Union Fire Insurance Company of Pittsburgh, PA's ("National Union").

² Local Civil Rule 6.3. Motions for Reconsideration or Reargument: "Unless otherwise provided by the Court or by statute or rule (such as Fed. R. Civ. P. 50, 52, and 59), a notice of motion for reconsideration or reargument of a court order determining a motion shall be served within fourteen (14) days after the entry of the Court's determination of the original motion, or in the case of a court order resulting in a judgment, within fourteen (14) days after the entry of the judgment."

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Tutor Perini's last day to file the motion:	December 14, 2012
Chartis and Lloyd's last day to respond:	January 7, 2012
Tutor Perini's last day to file reply:	January 14, 2012

No other extensions have been requested regarding Tutor Perini's time to file a motion for reconsideration pursuant to Local Rule 6.3. Counsel for both Chartis and Lloyd's join in the briefing scheduled proposed above. In addition to upcoming holiday schedules, Counsel for Chartis has a trial scheduled on December 17, 2012 in New Hampshire. For these reasons, the Parties respectfully request that the Court grant their request for an extension on Tutor Perini's time to file a motion for reconsideration and the proposed briefing scheduled set forth above.

Respectfully submitted,

Alex Hardiman (VMP)

Alex D. Hardiman

cc: Chartis' Counsel
Joshua W. Gardner (JGardner@edwardswildman.com)

Lloyd's Counsel
George Rockas (George.Rockas@wilsonelser.com)

ordered
Extension + schedule
granted as set forth
herein.

11/30/12

K. B. Forrest

HON. KATHERINE B. FORREST
UNITED STATES DISTRICT JUDGE